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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.

23 UBER TECHNOLOGIES, INC.;  
24 OTTOMOTTO LLC; OTTO TRUCKING  
25 LLC,

26 Defendants.

27  
28 **DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF ITS  
SUPPLEMENTAL BRIEF IN SUPPORT  
OF ITS MOTION TO COMPEL  
PRODUCTION OF WITHHELD  
DOCUMENTS AND EXHIBITS  
THERETO**

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1 I, Lindsay Cooper, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
 7 Seal Portions of Its Supplemental Brief in Support of its Motion to Compel Production of Withheld  
 8 Documents and Exhibits Thereto, filed concurrently herewith (the “Administrative Motion”). The  
 9 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Supplemental Brief in Support of its Motion to Compel Production of Withheld Documents	Highlighted Portions	Defendants <sup>1</sup> (blue highlighting)
Exhibits 12-13 of the Declaration of Patrick Schmidt (“Schmidt Decl.”)	Entire Documents	Defendants

16       3. Waymo seeks to seal information designated by Defendants as confidential or  
 17 attorneys’-eyes-only information. Waymo expects Defendants to file one or more declarations to  
 18 support the sealing of this information.

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26       <sup>1</sup> Defendants refers to Uber Technologies, Inc. (“Uber”), Ottomotto LLC (“Ottomotto”), and  
 27 Otto Trucking LLC (“Otto Trucking”) collectively.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on May 30, 2017.

4 By */s/ Lindsay Cooper*  
5 Lindsay Cooper  
6 Attorneys for WAYMO LLC

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8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
10 filing of this document has been obtained from Lindsay Cooper.

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12 */s/ Charles K. Verhoeven*  
13 Charles K. Verhoeven

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